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8 IN THE UNITED STATES DISTRICT COURT

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10 FOR THE EASTERN DISTRICT OF CALIFORNIA

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12 UNITED STATES OF AMERICA,) No. 2:04-cr-00387- MCE
13 Plaintiff,)
14 v.) STIPULATION TO CONTINUE
15 JESUS RODRIGUEZ,) STATUS CONFERENCE FROM
Defendant.) APRIL 24, 2007 TO MAY 31,
TIME UNDER SPEEDY TRIAL ACT

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19 IT IS HEREBY STIPULATED AND AGREED between the defendant, Jesus Rodriguez, and
20 the United States of America, through defense counsel, Bruce Locke and Assistant U.S. Attorney
21 Phillip Talbert, that the Status Conference set for April 24, 2007 should be continued to May 31,
22 2007 at 9:00 a.m. The reason the continuance is that the defense has not yet received the additional
23 discovery that the government has advised is coming. The government has recently advised the
24 defense that the discovery should be forthcoming within the next week. The defense will need
25 additional time to review that discovery before the defense will be in a position to advise the Court
26 of how much additional time will be required before the case will be ready for trial. The parties
27 agree that the time between April 24, 2007 and May 31, 2007 should be excluded from the Speedy
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1 Trial computation for the reason that the additional time is needed for defense preparation. Mr.
2 Talbert has authorized the undersigned to sign this Stipulation and Order for him.
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4 DATED: April 19, 2007

/S/
5 BRUCE LOCKE
Attorney for Mr. Jesus Rodriguez
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7 DATED: April 19, 2007

8 /S/ BRUCE LOCKE
for PHILLIP TALBERT
9 Assistant U.S. Attorney
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11 IT IS SO ORDERED.
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13 Dated: May 2, 2007

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15 MORRISON C. ENGLAND, JR.
16 UNITED STATES DISTRICT JUDGE
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